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## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA HARRISONBURG DIVISION



IN THE MATTER OF THE SEARCH OF INFORMATION ASSOCIATED WITH SALES@VACATIONPROPERTIESBY OWNER.NET THAT IS STORED AT PREMISES CONTROLLED BY PERFECTPRIVACY.COM

**SEALED** 

Case No. 5:17m/14

## MOTION TO SEAL

The United States of America requests that the Search and Seizure Warrant, the Application for Search and Seizure Warrant, the Search and Seizure Warrant Affidavit, the Inventory Return, the Application for Order for Non-Disclosure, the Order for Non-Disclosure, this Motion to Seal, and Order to Seal remain under seal of this Court for the following reasons:

- 1. The government states that the disclosure of the above-listed documents would seriously jeopardize the ongoing investigation, including by giving targets an opportunity to flee, destroy or tamper with evidence, change patterns of behavior, or notify confederates of the criminal investigation.
- 2. Given the nature of this investigation and the number of potential targets and/or victims involved, the government expects that it will take several months to conclude the investigation.

For the reasons set for above, the government respectfully moves this Honorable Court to seal the above-listed documents for 90 days or until further order of this Court.

Respectfully submitted,

RICK A. MOUNTCASTLE

## Acting United States Attorney

/s/ Erin M. Kulpa

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